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9 *Designated solely for service pursuant to LR IA 11-1(b)*

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11 **UNITED STATES DISTRICT COURT**
12 **IN AND FOR THE DISTRICT OF NEVADA**
13

14 SMART RAIN SYSTEMS, LLC,

15 Plaintiff,

16 vs.

17 ROHREN – UND PUMPENWERK BAUER
18 GES M.B.H., and BAUER NORTH
AMERICA, INC.,

19 Defendants.
20

Case No. 2:22-cv-00232-CDS-EJY

JOINT STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND THE DEADLINE
TO RESPOND TO THE COMPLAINT
(TENTH REQUEST)

21
22 IT IS HEREBY STIPULATED AND AGREED, by Plaintiff Smart Rain Systems, LLC
23 (“Smart Rain”), and Defendant Bauer North America, Inc. (“Bauer NA”), Defendant Rohren -
24 und Pumpenwerk Bauer Ges.m.b.H. (“Bauer GmbH”) (collectively, “Bauer”), through their
25 respective counsel, that the time for Bauer to respond to the Complaint be extended up to and
26 including July 7, 2023. Bauer’s current deadline to respond to the Complaint is May 26, 2023.
27 Counsel for the parties have continued to engage in discussions and have exchanged proposed
28

1 settlement terms to resolve this matter without the need for further litigation. The parties are in
 2 the process of considering and further negotiating potential settlement terms in light of the
 3 parties' various intellectual property rights. The additional time stipulated to herein will allow
 4 the parties to continue to explore a potential early resolution of the claims in this case.

5 The reason for the extension is not for purposes of delay or to cause prejudice to any
 6 party, but to allow the parties to continue to engage in ongoing settlement negotiations. This is
 7 the parties' tenth stipulated request for such an extension from the Court, having had previous
 8 extensions granted on June 3, 2022 [Docket 17], August 4, 2022 [Docket 19], September 7, 2022
 9 [Docket 21], October 5, 2022 [Docket 25], November 4, 2022 [Docket 29], December 6, 2022
 10 [Docket 31], January 19, 2023 [Docket 33] March 2, 2023 [Docket 35] and April 12, 2023
 11 [Docket 37]. This request complies with Local Rules IA 6-1, IA 6-2, and 7-1.

12 DATED this 25th day of May, 2023.

13 RAY QUINNEY & NEBEKER P.C.

14 /s/ Z. Ryan Pahnke

15 Z. Ryan Pahnke

16 Nevada Bar No. 9641

17 *Attorney for Plaintiff*

18 David J. Malley

19 Nevada Bar No. 8171

20 *Designated counsel pursuant to LR IA 11-1(b)*

EVANS FEARS & SCHUTTERT LLP

21 /s/ Chad R. Fears

22 Chad R. Fears

23 Nevada Bar No. 6970

24 Michael S. Golenson, Esq. (*pro hac vice to*
be filed)

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Attorneys for Defendants

ORDER

**IT IS SO ORDERED, provided, however, no
 further extensions of time will be granted absent
 extenuating circumstances.**


 UNITED STATE MAGISTRATE JUDGE

Dated May 25, 2023